JONES DAY

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JP215316:kmj 560600-012053

January 16, 2004

VIA FEDERAL EXPRESS

Seth Ausubel
Remedial Project Manager
United States Environmental Protection Agency
Region II
Emergency and Remedial Response Division
290 Broadway, 19th Floor
New York, NY 10007-1866

Re: Berry's Creek Study Area

Dear Mr. Ausubel:

I submit herewith the response of Roadway Express, Inc. to the October 17, 2002 CERCLA Section 104(e) request. On behalf of Roadway Express, I apologize for the delay in responding, which was occasioned in part by some extraordinary events in the life of the company and the persons preparing the response. Also contributing was the large amount of material that had to be gathered and reviewed in order to respond.

Please note that Roadway's response goes well beyond the minimum, in that it has prepared a twelve-page, single-spaced Site History/Environmental Summary, which provides a summary and road map of the numerous, lengthy attachments. This document should greatly facilitate EPA's understanding of the responses to the questions and the contents of the attachments, thereby saving the agency a significant amount of time in reviewing these materials.

Very truly yours,

Ronald R. Janke

Enclosures

cc: Clay Monroe (with enclosures/without attachments)

cc: Robert E. Zimmermann (without enclosures)

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Request for Information

in the Matter of the Berry's Creek Study Area, Bergen County, New Jersey

Roadway Express, Inc.

INSTRUCTIONS FOR RESPONDING TO REQUEST FOR INFORMATION

A. Directions

- 1. A complete and separate response should be given for each question.
- 2. Identify each answer with the number of the question to which it is addressed.
- 3. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the question to which it applies.
- 4. Provide responses to the best of the Respondent's ability, even if the information sought was never put in writing or if the written documents are no longer available.
- 5. In preparing your response to each question, consult with all present and former employees and agents of your company whom you have reason to believe may be familiar with the matter to which the question pertains.
- 6. In answering each question, identify each individual and any other source of information (including documents) that was consulted in the preparation of the response to the question.
- 7. If you are unable to give a detailed and complete answer, or to provide any of the information or documents requested, indicate the reason for your inability to do so.
- 8. If you have reason to believe that an individual other than one employed by your company may be able to provide additional details or documentation in response to any question, state that person's name, last known address, phone number and the reasons for your belief.
- 9. If a document is requested but not available, state the reason for its unavailability. To the best of your ability, identify the document by author, date, subject matter, number of pages, and all recipients of the document with their addresses.
- 10. If anything is omitted from a document produced in response to this Request for Information, state the reason for, and the subject matter of the omission,
- 11. If you cannot provide a precise answer to a question, please approximate but, in any such instance, state the reason for your inability to be more specific.
- 12. Whenever this Request for Information requests the identification of a natural person, or other entity, the person or entity's full name and present or last known address also should be provided.
- 13. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA.

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- 14. <u>Confidential Information</u>. The information requested herein must be provided even though you may contend that it includes confidential business information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. Sections 9604(e)(7)(E) and (F), and 40 C.F.R. Section 2.203(b).
- 15. If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response you claim to be confidential, you must separately address the following points:
 - a. the portions of the information which are alleged to be entitled to confidential treatment;
 - b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
 - c. measures taken by you to guard against the undesired disclosure of the information to others;
 - d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
 - e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
 - f. whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise non-confidential documents should be clearly identified. Please submit your response so that all non-confidential information, including any redacted versions of documents, are in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e) and 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.

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B. Definitions

- 1. As used herein, the term "Roadway Express Site", or "Site", shall be the property or properties, located at 650 Commercial Avenue and/or 700 Commercial Avenue, Carlstadt, Bergen County, New Jersey, and comprised, in whole or in part, of Block 126, Lot 74, Borough of Carlstadt.
- 2. As used herein, the term "Berry's Creek Study Area" shall be identified as the water body known as Bony's Creek, including the Berry's Creek Canal and the natural course of Berry's Creek; and all water bodies tributary to Berry's Creek, from its headwaters to the Hackensack River; and wetlands that are hydrologically connected to Berry's Creek and/or its tributaries. Additionally, the Study Area includes upland properties in the Berry's Creek watershed. The Study Area is located in Bergen County, New Jersey, including portions of the Boroughs of Carlstadt, WoodRidge, Rutherford, East Rutherford, Moonachie, Hasbrouck Heights, Little Ferry, Lyndhurst, and Teterboro.
- 3. As used herein, the terms "the Company" and "your Company" refer not only to your Company as it is currently named and constituted, but also to all predecessors in interest of your Company and all subsidiaries, divisions, affiliates and branches of your Company or of its predecessors.
- 4. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but and not limited to, containers for temporary or permanent holding of such wastes.
- 5. As used herein, the term "hazardous substance" shall have the meaning set forth in Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14). The substances which have been designated as hazardous substances pursuant to Section 102(a) of CERCLA (which, in turn, comprise a portion of the substances that fall within the definition of "hazardous substance" under Section 101(14) of CERCLA) are set forth at 40 C.F.R. Part 302.
- 6. As used herein, the terms "hazardous waste," "disposal" and "storage" shall have the meanings set forth in Sections 1004(3), (5) and (33) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Sections 6903(3), (5) and (33), respectively.
- 7. As used herein, the term "industrial waste" shall mean any solid, liquid or sludge or any mixture thereof which possesses any of the following characteristics:
 - a. it contains one or more "hazardous substances" (at any concentration) as defined in 42 U.S.C. Section 9601(14);
 - b. it is a "hazardous waste" as defined in 42 U.S.C. Section 6903(5);
 - c. it has a pH less than 2.0 or greater than 12.5;
 - d. it reacts violently when mixed with water;

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- e. it generates toxic gases when mixed with water;
- f. it easily ignites or explodes;
- g. it is an industrial waste product;
- h. it is an industrial treatment plant sludge or supernatant;
- i. it is an industrial byproduct having some market value;
- j. it is coolant water or blowdown waste from a coolant system:
- k. it is a spent product which could be reused after rehabilitation; or
- 1. it is any material which you have reason to believe would be toxic if either ingested, inhaled or placed in contact with your skin.
- 8. The term "pollutant or contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA, 42 U.S.C. Section 9601 (33), and includes any mixtures of such pollutants or contaminants with any other substances. Petroleum products mixed with pollutants and contaminants are also included in this definition.
- 9. The term "release" has the same definition as that contained in Section 101(22) of CERCLA, 42 U.S.C. Section 9601(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, disposing into the environment, including the abandonment or discarding of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.
- 10. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including, but not limited to, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations, including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement. journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record any photograph, sound recording or any type of device, any punch card, disk or tape or other type of memory generally associated with computers and data processing (together with the programming instructions necessary to use such computer memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosure with any document, and (e) every document referred to in any other document.
- 11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question.

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- 12. The term "identify" means, with respect to a natural person, to set forth: (a)the person's full name; (b) present or last known business and home address and telephone numbers; and (c) present or last known employer (include full name, address and telephone number) with title, position, occupation or business.
- 13. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g. corporation, partnership, etc.), and a brief description of its business.
- 14. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or RCRA, in which case the statutory definitions shall apply.

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REQUEST FOR INFORMATION

Introduction

To assist EPA in reviewing the large number of substantial reports that are attached to this response, Roadway has prepared a narrative Site History/Environmental Summary which appears after the last numbered response. Roadway recommends that EPA read this summary before reading the numbered responses or the attachments.

Roadway Express, Inc., submits this response subject to certain objections and reservations of rights, notwithstanding its response to certain objectionable questions reflecting its desire to cooperate with EPA in its investigation.

Roadway objects to questions seeking information beyond the scope of information and documents described in CERCLA Section 104(e). Roadway disclaims any responsibility to provide information from anyone other than current employees whom Roadway believes may possess information response to this Information Request, and Roadway objects to any requests that may be interpreted as requiring Roadway to provide information from other persons. Roadway disclaims any responsibility to update this response to identify unavailable documents or omissions from documents, or to state the reasons for any inability to provide more specific information. These information requests are unreasonable and responses are not mandated by CERCLA. Roadway objects to any question to the extent it requires disclosure of the home address of any former or present employee. Roadway objects to any requirement to identify all documents or persons who were consulted in the preparation of this response because such information is irrelevant and beyond the EPA's statutory authority.

Subject to and without waiving the foregoing objections, Roadway sets its responses to the Information Requests as follows:

1. a. State the correct legal name and mailing address of your Company.

RESPONSE: Roadway Express, Inc. 1077 Gorge Boulevard P.O. Box 471 Akron, OH 44309-0471

b. Identify the legal status of your Company (corporation, partnership, sole proprietorship, specify if other) and the state in which your Company was organized or formed.

RESPONSE: Roadway Express, Inc., is a corporation, incorporated under the laws of the State of Delaware.

c. State the name(s) and address(es) of the President, Chairman of the Board, and the Chief Executive Officer of your Company.

RESPONSE: James D. Staley

Chief Executive Officer and President - Roadway Group Robert L. Stull

President

Roadway Express, Inc. 1077 Gorge Boulevard P.O. Box 471 Akron, OH 44309-0471

d. If your Company is a subsidiary or affiliate of another corporation, or has subsidiaries, identify each such entity and its relationship to your Company, and state the name(s) and address(es) of each such entity's President, Chairman of the Board, and Chief Executive Officer.

RESPONSE: Roadway Express, Inc, is a subsidiary of Yellow Roadway Corporation; 10990 Roe Avenue, Overland Park, Kansas 66211.

William Zollars
Chairman, Chief Executive Officer and President

e. Identify the state and date of incorporation and the agent for service of process in the state of incorporation and in the State of New Jersey for your Company and for each entity identified in your response to question I.d., above.

RESPONSE: Roadway Express, Inc. was incorporated on February 15, 1954 in Delaware. Yellow Roadway Corporation (formerly Yellow Corporation) was incorporated on February 3, 1983 in Delaware. Their registered agent for process is The Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware 19801.

f. If your Company is a successor to, or has been succeeded by another entity, identify such other entity and provide the same information requested in question 1.e., above.

RESPONSE: Not applicable.

2. Provide a description of the Site, i.e. the property or properties in Carlstadt, Bergen County, New Jersey, which your Company owned or Owns, or upon which it operated or leased, or currently operates or leases, Include Block and Lot numbers, names of streets or physical features bounding the property(ies), and acreage.

RESPONSE: 8.5 acres between Commercial Avenue and South Commercial Avenue, 700 Commercial Avenue, Carlstadt, New Jersey 07072, Block 126, Lot 74, Borough of Carlstadt, County of Bergen. A legal description is included in Attachment A.

The site has two buildings situated on it. The primary building is a 92-door motor freight terminal (truck docks and offices). This facility is owned and operated by Roadway

Express, Inc. There is also a 12,600 square foot (s.f.) 6-bay vehicle maintenance shop. Roadway Express, Inc. uses a portion of the maintenance shop and currently leases the remaining portion to Salem Truck Leasing.

The mailing address and street names are:

Roadway Express, Inc. 700 Commercial Avenue Carlstadt, New Jersey 07072 Salem Truck Leasing 650 Commercial Avenue Carlstadt, New Jersey 07072

3. Provide a narrative description of the nature of the Company's business. If the nature of the Company's business changed over time, please explain how it changed, (including any name changes) and approximately when the changes occurred.

RESPONSE: Roadway Express is a less-than-truckload (LTL) motor carrier, i.e., it picks up and delivers freight. Roadway Express performs national Less-Than-Truckload (LTL) trucking operations. Freight to be delivered is picked up locally at Roadway's customers' places of business and brought back to the local terminal. The trucks are then emptied and the freight is transferred and consolidated in different trucks that head off to regional "breakbulks" (large consolidation centers). At the breakbulk, any particular piece of freight is sent to a destination which is dependent upon where the shipment is to be ultimately delivered. The freight on each truck is then "broken down" by destination and delivery to the shippers customer is finalized. There has been virtually no change in Roadway's business and procedures for the past 50 years.

4. Please specify the time period during which the Company leased, owned, and/or operated the Site. If the Company leased, owned or operated at portions of the Site, specify the time periods of such involvement, and appropriate block and lot numbers. If your Company ever leased the Site, provide copies of leases, names, current addresses and telephone numbers of each owner of the Site during the period the Company leased the Site.

RESPONSE: Roadway bought the Site on June 4, 1986 from a Donald T. Singleton (27. Lancaster Road, Tenafly, NJ 07670). A copy of the Deed is presented as Attachment B. Roadway has been in continuous ownership of the property since that date. Roadway's operations at this facility began on August 24, 1986.

Roadway has never leased the site, or a portion thereof, from any entity; however, Roadway has leased a portion of the maintenance shop to two different entities since acquiring the property in 1986. From August 6, 1987 through August 31, 2000, a portion of the shop was leased to Ryder Truck Rental. From November 1, 2000 to present, the same portion of the shop has been leased to Salem Truck Leasing. Copies of the leases and lease notices are presented in Attachment C. Because Roadway takes its environmental responsibility very seriously, Roadway's Pollution Prevention manual is incorporated into every lease as a condition of the lease. Every tenant is expected to abide by Roadway's methods of operation and run a clean operation. A copy of this

document is presented as part of the Salem Truck Leasing lease documents in Attachment C.

5. Describe the Site at the time the Company took possession of it. If there was any business at the Site, explain the nature of that business.

RESPONSE: A trucking terminal was constructed on the Site in 1962, expanded in 1966, and operated by Oneida Trucking until about a year prior to Roadway's acquisition. The site prior to Roadway's possession is further described in an attached Site History/Environmental Summary and the April 18, 1986 OHM Summary of Findings, Project No. 3477. Aerial photos and topographical maps depicting the site at various times prior and after Roadway's possession are located in Attachment O.

At the time Roadway took possession of the Site, its configuration was essentially the same as to how it is today. Oneida Motor Freight, Inc. operated out of this location for over 20-years. They performed trucking operations similar to Roadway's operations. Oneida did perform vehicle maintenance and fueling activities at the Site. Filing of Chapter 11 Bankruptcy by Oneida made the property available at the time that Roadway bought it, so there were no active operations at the time Roadway purchased the site, as they had already declared bankruptcy and ceased operations for about a year.

At the time of purchase, the facility had nine known underground storage tanks (UST's) which are depicted in Figure 3. These consisted of four 4,000-gallon diesel fuel tanks, two 4,000-gallon gasoline tanks, one 8,000-gallon gear oil tank, one 8,000-gallon motor oil tank, and one 1,000-gallon used oil tank. Prior to purchase, each of the UST's were tightness tested. Two of the UST's failed the tightness test. During subsequent tank removal activities, a 550-gallon used oil tank was also identified and removed, as described in the attached Site History/Environmental Summary.

- 6. Describe in detail the nature of the activities conducted by the Company at the Site from the time the Company began operations at the Site until the present time, including:
 - a. the services performed at the Site:

RESPONSE: Roadway's trucks bring freight to the freight handling dock where it is loaded onto other Roadway trucks for delivery. Trucks are maintained in the garage. Administrative operations are conducted in the office. At the subject site, Roadway also performs vehicle maintenance activities inside the maintenance garage. Activities include fueling, normal tune-ups, oil and tire changes, lubrication, brake repair and general/routine maintenance activities. Major repair work, such as engine overhauls, transmissions, major body repair, etc. is farmed out to off-site vendors or performed at alternate locations within the Roadway network.

b. all products which the Company manufactured, supplied or sold which resulted from activities at the Site;

RESPONSE: None. No manufacturing or sale of products takes place, only the sale of freight transportation services.

c. research and development activities; and

RESPONSE: None.

d. the time period during which those activities occurred.

RESPONSE: Roadway has conducted freight handling activities, maintenance and administrative operations at the Site since it began operations there on August 24, 1986.

7. Did your Company cease operations at the Site? If so, when? Describe the circumstances that precipitated your Company's decision to cease operations at the Site.

RESPONSE: No.

8. Did your company generate hazardous wastes at the Site, or does your company currently do so? Please describe your company's treatment, storage and/or disposal practices for any hazardous wastes generated at the Site.

RESPONSE: Roadway has generated solvents from parts washing, non-hazardous soil from tank removals and certain types of damaged freight. These wastes and their disposal are described in the manifests in Attachment P. There has been no onsite treatment or disposal. Damaged freight is stored in 55-gallon drums. Management of soil from tank removals is described in Attachments E, F, H and J.

9. Provide a list of all local, state and federal environmental permits ever granted for the Site or any part thereof (e.g., RCRA permits, NPDES permits, etc.)

RESPONSE: Stormwater Permit - #NJ0106640. A copy of the stormwater permit is included in Attachment D.

10. List all hazardous substances (as defined in the "instructions"), which were, or are, used, stored, or handled at the Site.

RESPONSE:

<u>Hazardous Substances Used On-Site</u> (past and present)

- Diesel fuel
- Motor oil
- Antifreeze
- Brake fluid
- Transmission fluid
- Non-chlorinated parts degreaser
- Gear oil

- Gasoline (by previous owner Oneida Freight only)
- Windshield washer fluid
- Hydraulic fluid

Hazardous Substances Stored On-Site (past and present)

- Diesel fuel
- Motor oil
- Gear oil
- Antifreeze
- Transmission fluid
- Gasoline (by previous owner Oneida Freight only)
- Non-chlorinated parts degreaser
- Brake fluid
- Windshield washer fluid
- Hydraulic fluid

<u>Hazardous Substances Handled On-Site (past and present)</u>

As a LTL carrier, Roadway Express has handled a wide range of freight from its customers at the Site, and we presume that Oneida Freight did as well. Many of these pieces of freight may have contained "hazardous substances" as defined in this request for information. Roadway Express has not transported or handled at this Site any solid waste or hazardous waste from customers. See Response to question 3 regarding freight handling procedures.

11. State when and where each substance identified in your response to Question 10 was, or is, used, stored, or handled at the Site and the volume of each substance.

RESPONSE:

Hazardous Substances Used and Stored On-Site (past and present)

- Motor oil stored in 55-gallon drums inside the garage
- Antifreeze stored in 55-gallon drums inside the garage
- Brake fluid stored in 55-gallon drums inside the garage
- Transmission fluid stored in 55-gallon drums inside the garage
- Non-chlorinated parts degreaser stored in parts washer inside the garage
- Gear oil stored in 55-gallon drums inside the garage.
- Gasoline formerly stored in two 4,000-gallon underground storage tanks by Oneida Freight
- Windshield washer fluids stored in 55-gallon drums or smaller in the garage
- Hydraulic fluid stored in 55-gallon drum in the garage
- Used motor oil stored in 300-gallon and 280-gallon aboveground storage tanks inside the garage.

See also Attachment S.

12. Describe in detail how and where the hazardous wastes, industrial wastes, and hazardous substances generated, handled, treated, and stored at the Site were, or are, disposed of. If any hazardous wastes, hazardous substances, or industrial wastes were, or are, taken offsite for disposal or treatment, state the names and addresses of the transporters and the disposal facility used.

RESPONSE: See responses to question 8 and 11 and Attachment Q.

13. Who determined, or determines, where to treat, store, and/or dispose of the hazardous substances and/or hazardous wastes handled at the Site? Provide the names and current or last known addresses of any entities or individuals which made such determination.

RESPONSE: These determinations are made by the Manager, Environmental Services, and the Manager, Hazardous Materials, in accordance with the procedures set forth in the manuals contained in Attachment R.

14. Describe in detail the remedial activities conducted at the Site under CERCLA, the Resource Conservation and Recovery Act (RCRA), and/or laws of the State of New Jersey Describe your Company's involvement in the remedial activities.

RESPONSE: Roadway has not conducted any remedial activity at the Site under CERCLA or RCRA. A cleanup has been conducted under New Jersey's underground storage tank regulations for tanks that were pre-existing on the Site at the time Roadway bought the property. The remedial activities are discussed in detail in the Site History/Environmental Summary Document.

- 15. Identify all leaks, spills, or releases into the environment of any hazardous substances, pollutants, or contaminants that have occurred, or are occurring, at or from the Site. Specifically identify and address any leaks, spills, or releases to the Berry's Creek Study Area. Identify:
 - a. when such releases occurred;
 - b. how the releases occurred;
 - c. the amount of each hazardous substances, pollutants, or contaminants so released (for substances contained in any sewage effluent from the Site, provide discharge monitoring reports or other data indicating discharge concentrations and loads, as available);
 - d. where such releases occurred;
 - e. where such releases entered the Berry's Creek Study Area, if applicable; and

f. the pathway by which such releases entered the Berry's Creek Study Area, including any storm sewers, pipes, or other conveyances discharging to a water body or wetland; or via surface runoff, groundwater discharge, or any spills, leaks, or disposal activities.

RESPONSE: See information in Attachments E, F, H, J and T and Summary Report. There are no known releases from the site to the Berry's Creek Study Area.

16. Please complete the form on page 5, below, indicate on the form whether each of the chemicals listed has ever been released from the Site to the Berry's Creek Study Area, including creeks, ditches, or other water bodies, or wetlands. Follow all additional instructions on the form, in addition, please answer Question 15, above, specifically addressing any chemicals for which you answered "yes"

RESPONSE: See response to Question 15.

17. Identify all companies, firms, facilities, and individuals (hereafter referred to as "customers") from whom your Company obtained, or obtains, materials containing Industrial Waste as defined in Number 6 of the Definitions and whose Industrial Waste was, or is, treated, stored, handled or disposed of at the Site. For each such customer:

RESPONSE: None.

- a. Describe the relationship (the nature of services rendered and products purchased or sold) between your Company and the customer,
- b. Provide Copies of any agreements or/and contracts between your Company and the customer;
- c. Provide the name and address of each customer who sent such materials, including contact person(s) within said customer;
- d. Provide shipping and transaction records pertaining to such Industrial Wastes sent by each customer, including but not limited to invoices, delivery receipts, receipts acknowledging payment, ledgers reflecting receipt of payment, bills of lading, weight tickets, mid purchase orders; and
- e. Provide the name and address of all companies and individuals who transported, or transport, Industrial Wastes to the Site.
- 18. For each customers' Industrial Wastes handled, treated, stored, or disposed of at the Site, describe:

RESPONSE: Not applicable.

- i. the volume;
- ii. the nature;
- iii. chemical composition;

iv. color;

v. smell;

vi. physical state (e.g., solid, liquid);

vii. any other distinctive characteristics; and

viii. the years during which each customer's materials were handled, treated, stored, or disposed of at the Site.

19. Please supply any additional information or documents that may be relevant or useful to identify other companies or sources that sent industrial wastes to the Site.

RESPONSE: Not applicable.

20. Please state the name, title and address of each individual who assisted or was consulted in the preparation of your response to this Request for Information and correlate each individual to the question on which he or she was consulted.

RESPONSE: Robert Zimmermann

Manager - Environmental Services (Dept. A-20)

Leona Bowser

Manager - Hazardous Materials

Roadway Express, Inc.

P.O. Box 471

1077 Gorge Boulevard

Akron, OH 44309-0471

Peter Della Rosa, Jr.

Terminal Manager

Vince Bruno

Garage Manager

Roadway Express, Inc.

700 Commercial Avenue

Carlstadt, NJ 07072

21. For each question herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the question and provide true and accurate copies of all such documents.

RESPONSE: All documents containing responsive information are produced herewith as attachments. Other documents, too numerous to list, were consulted but did not contain any response information, and are not being produced due to the burdensome nature of this request which is also beyond the scope of CERCLA Section 104(e).

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of Ohio

County of Summit

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or the company's response thereto should become known or available to the company.

NAME (print or type)

MANAGER - ENVIRONMENTAL SERVICES
TITLE (print or type)

Sworn to before me this 15

day of pen., 20

JOYCE A. HAFIDMAN, Notary Public Presidence - Summit County State Wide Juridiction, 1940 My Commission Explana May 24, 242

JANUARY 19, 2004

1.0 BACKGROUND

Roadway Express, Inc. (Roadway) purchased the subject property on June 4, 1986 and began motor freight operations at this location on August 24, 1986. At the time of purchase, the site consisted of a 92-door, 72,000-square foot (s.f.) truck terminal and a 12,600-s.f. vehicle maintenance garage situated on 8.5 acres of land. This configuration has not changed since the purchase of the property. A legal description of the property is presented in Attachment A and a copy of the deed is presented in Attachment B. Roadway has operated at the terminal facility since that time, although portions of the garage and offices have been leased out to several different tenants over this time period. Copies of the lease agreements are presented in Attachment C. At the time of purchase, it was believed that nine underground storage tanks (USTs) were present at the site. During their subsequent removal, two additional tanks were discovered, bringing the total to 11. The only environmental issues that Roadway has had at this location have been with respect to minor impacts to the soil and groundwater caused by the pre-existing USTs and/or fill material that the facility was originally built on. Following is a discussion of information Roadway is aware of regarding the pre-existing activities at the site prior to the purchase, a discussion of environmental clean-ups that Roadway has conducted at the facility, the facility's current environmental status, and a discussion of Roadway's product and waste management practices and protocols at the subject site.

2.0 SITE SEARCH/DUE DILIGENCE

2.1 Initial Environmental Due Diligence

Roadway began a search for a truck terminal in the Carlstadt area in 1985. After considering several local properties, Roadway decided that an existing truck terminal located at 650 Commercial Avenue best fit its needs, based upon cost, configuration, size, location and other business factors. As a result, it pursued the purchase of the subject site. The site had a 92-door truck terminal with offices and a six-bay vehicle maintenance garage situated on 8.5 acres of land. It was owned by Donald T. Singleton, but had been leased to Oneida Motor Freight, Inc. (site was called Oneida Terminal West). At the time of Roadway's purchase, the site had been vacant for approximately one year, as Oneida Motor Freight had filed for Chapter 11 Bankruptcy and had vacated the site. Although the dates are not certain, Roadway believes that the site was developed in 1962 and was expanded to its current configuration in 1966. A general location map is attached

as Figure 1 and a site plan showing the layout of the property at the time of purchase is attached as Figure 2.

The site was reported to have nine underground storage tanks (although upon their subsequent removal after Roadway bought the property, two additional USTs were found). These included:

Four 4,000-gallon diesel fuel (Tanks 1 through 4); Two 4,000-gallon gasoline (Tanks 5 and 6); One 8,000-gallon gear lube (Tank 7); One 8,000-gallon motor oil (Tank 8); and One 1,000-gallon used oil (Tank 9).

The four diesel tanks were located west of (behind) the garage in a cluster. Tanks 1 and 3, and 2 and 4 were manifolded together. Both gasoline tanks were located further west and situated adjacent to each other, but end to end. The remaining three tanks were located east (in front of) the maintenance garage in a cluster just outside of the northeast corner of the garage. The known tank locations at the time of purchase are shown on Figure 3.

Prior to purchase of the property, Roadway retained an environmental consultant to conduct all appropriate inquiries as to the previous uses and ownership of the property. Based upon that inquiry, conducted in accordance with good commercial procedures and reported in a Phase I ESA, the USTs appeared to be the only item that presented an environmental concern with the site.

2.2 Additional Environmental Due Diligence

Prior to purchasing the property, Roadway also performed a Phase II Environmental Site Assessment. Activities included performing tightness tests on the USTs and drilling several soil borings around each of the three UST clusters to determine whether any environmental impact had occurred as a result of the USTs.

In March and April of 1986, each of the known tanks was precision tested by O.H. Materials (OHM) using the Petro-Tite method. A second test of the diesel tanks needed to be done because a conclusion could not be made due to the manifolding of the tanks together in pairs. Each tank was isolated and then tested individually. Because the tanks were empty, water had to be added in order to perform the tests. It was noted at the time of testing that the diesel tanks had been previously lined. The precision test results indicated that diesel Tanks 1 and 3 failed, but that the remaining seven USTs passed. The results of the investigation

were presented in a Summary of Findings Report-Project #3477 by OHM dated April 18, 1986. A copy of that report is included as Attachment E.

Because of the apparent age of the tanks, the fact that two tanks failed and some of the tanks had been lined, Roadway had OHM perform an environmental study in the vicinity of the tank clusters. A total of 11 soil borings were drilled at the site (four surrounding the diesel tanks, four surrounding the gasoline tanks, and three surrounding the third cluster). Based upon the results of soil sampling, OHM concluded that: "As for the extent of contamination of subsurface soil on site, our findings show that the subsurface soil in the areas where samples were taken is free from petroleum hydrocarbon contamination. The lab analysis (Attachment III) confirms this hypothesis." The results of the investigation are summarized in the previously-referenced report in Attachment E.

Based upon these results and the conclusions by Roadway's environmental consultants, Roadway concluded to move forward with the purchase of the facility. Additionally, because two of the diesel tanks had failed the precision tests, all of the tanks were approximately 20 years old, and all of the tanks had been lined, a decision was made at that point that Roadway would not use the existing diesel fuel tanks, but would remove them and install a new diesel fuel tank, which Roadway has done.

3.0 SITE PURCHASE

3.1 Site Closing

Roadway purchased (closed on) the site on June 4, 1986 from the owner, Donald Singleton, at a cost of \$4,800,000. Approximately \$25,000 had been reserved to pay for the cost of diesel tank removal. Operations at the facility began on August 24, 1986.

3.2 Environmental Activities

Prior to occupancy, Roadway decided to remove all four diesel fuel tanks and install a new 10,000-gallon fiberglass-coated steel (Buffhide) diesel fuel tank. Roadway never used any of the pre-existing USTs. Bids were obtained from several contractors and the removal and installation contract was awarded to ERM-Tanknomics. The results of these activities were presented in an April, 1987 report titled Final Report-Site Remediation by ERM-Tanknomics, Inc. A copy of this report is included as Attachment F.

All water placed into the tanks for the precision testing (all of the on-site tanks) was pumped out and hauled off-site for legal disposal. Manifests for the disposal of this liquid are included in the previously-referenced report in Attachment F.

4.0 DIESEL TANK REMOVAL, INSTALLATION AND REMEDIATION

4.1 Diesel Tank Removal

Removal of the four 4,000-gallon diesel fuel tanks began on August 8, 1986 and was concluded on August 11, 1986. Upon removal, all four USTs had pitting and visible holes, despite two of them testing tight during Roadway's due diligence investigation. The piping appeared to be in good condition. The environmental consultant indicated that the tight clay soils that were used as backfill likely kept the contents contained and gave the false positive test results. The tank linings may also have effectively sealed the potential leaks. A small amount of contamination was identified and approximately 125 to 150 cubic yards (yds³) of contaminated soil was removed and stockpiled on plastic. Surficial soils appeared to be the most impacted area, most likely from drippage during fueling activities. Some localized leaching of diesel into the sidewalls was observed, however, soil borings showed that the soil was clean about 2' from the wall. Impacted soils were removed and installation of the new diesel fuel tank into the same excavation commenced.

4.2 Soil Analyses

Composite soil analyses along the south, west and east walls, as well as three locations along the bottom of the pit, were sent to Lancaster Labs for analyses. Analyses indicated TPH levels of 60 ppm, which was below the State Action Level. No further remedial activities were necessary. The contaminated soil pile was hauled off site for disposal in September, 1986.

4.3 Diesel Tank Installation

After the removal of the diesel tanks and impacted soil, a new 10,000-gallon double-walled Buffhide tank (fiberglass clad steel tank) was installed. New piping running to the maintenance garage was installed and placed inside a Hytrel-lined piping trench, cathodically-protected and covered with a concrete slab. Two monitoring wells were placed within the backfill of the new UST. In April 1986, a Hunter Leak Locator Precision Test was performed on the new UST prior to its use, and it passed. Details of the installation are included in the previously referenced report in Attachment F. Additional specifications of the UST are included in Attachment G.

4.4 Additional Findings

During the investigation, a 1,000-gallon storage tank was discovered south of the garage area and north of a guard shack. This tank was not previously known to Roadway (Tank 10). It was believed that this UST was used for the collection of used oil within the garage area. At the same time as Hunter was on site to precision test the new diesel fuel tank, Roadway had them precision test this newly-discovered UST. It was found to be tight.

Based upon the severe pitting and presence of holes that were observed in the diesel fuel tanks, Roadway decided to remove the gasoline tanks also. Roadway never used either of these tanks, as they were present on the property when it was purchased.

5.0 GASOLINE TANK REMOVAL AND REMEDIATION

5.1 Gasoline Tank Removals

Removal of the gasoline tanks (Tanks 5 and 6) began on January 14, 1987. Upon removal, it was observed that both tanks had pitting and numerous visible holes in the bottom, despite their passing the Petro-Tite precision test. In addition, an additional unknown 550-gallon tank was discovered during the uncovering of Tank 5. There were no lines connecting it to Tanks 5 or 6, however, there was a 1½" line extending 36" upward to the ground surface. Actual use of this tank is not known, however, it is believed to have been a motor oil tank. It has been identified as Tank 11. Upon removal, this tank was observed to be extensively pitted also with visible holes in the bottom. Details of the removal are presented in the previously referenced report in Attachment F.

5.2 Soil Analyses

Visual and sensory evidence of impacted soils in the excavation was observed during the tank removal. A considerable amount of water had entered the excavation and a hydrocarbon sheen was observed. Upon further investigation, it was determined that the influx of water was due to backflow from a clogged sewer pipe, not groundwater. All contaminated soils within the excavation were removed. An additional 18" of soil was removed along each sidewall and from the bottom to remove any contamination that might have migrated through the soil.

Previous soil investigations did not identify soil contamination of soils in close proximity to the gasoline tanks. Additionally, three composite samples were collected from the excavation, which included a composite from all four walls, a composite from the bottom and a composite from the stockpile. Samples were analyzed for TPH, benzene, toluene and xylenes, which confirmed that all tested parameters were below State guidelines. Approximately 80 tons of soil were excavated and stockpiled on plastic for subsequent off-site disposal.

5.3 Additional Activities

Several oil/water separators were found on site and Roadway decided it was prudent to have these cleaned out before beginning operations. Details are as follows:

Former Truck Wash Area: A 400-gallon two-compartment separator that was pumped directly to the storm sewer (formerly used for handling discharge from a truck wash area) was cleaned out. Over 2,000 gallons of water was removed on August 14 and 15, 1986. The excess volume was due to backup within the storm sewer line. The inside of the separator was manually cleaned (scraped) and the sediment drummed for subsequent off-site disposal. Neither Roadway, nor any of its tenants, wash vehicles on site, so this separator is used only for the conveyance of storm water.

Yard Separators 1 and 2: Two 400-gallon two-compartmented oil/water separators were found in the garage driveway area, adjacent to the new UST. A pump pit was also associated with these separators, although no pump was present. Roadway believes this feature was designed to discharge to a 300-gallon sump adjacent to the garage and then discharge to the storm sewer, however, without a pump, it was non-functional. On August 14 and 25, 1986, approximately 550 gallons of water and 550 gallons of sediment were removed from the structure for subsequent off-site disposal.

Garage Pit Area: On August 14, 1986, over 2,000 gallons of water and 195 gallons of accumulated sediment was cleaned out and drummed for disposal. A 6" inlet and a 1" and 1½" outlet pipe were capped. By early September, another 2,000 gallons of water had entered the pit and was removed for subsequent offsite disposal. A faulty check valve going to the sanitary sewer was found and a plumbers plug was added. A connection to Tank 10 was eliminated and a new 1½" line was installed for the direct input of waste oil to the tank. Roadway did decide to utilize this tank based upon precision test results.

It was recommended by ERM-Tanknomics that the remaining USTs in front of the garage (Tanks 7, 8 and 9) be removed.

6.0 REMOVAL OF MOTOR OIL, GEAR OIL AND USED OIL TANKS

6.1 Motor Oil, Gear Oil and Used Oil Tank Removals

On April 14-17, 1989, the 8,000-gallon motor oil, 8,000-gallon gear oil and 1,000-gallon used oil tanks were removed from in front of the garage (Tanks 7, 8 and 9). Roadway never used these tanks, as they were present at the site at the time of purchase. Prior to removal, all liquids present in the USTs were vacuumed out and hauled off-site for legal disposal. During removal of the gear oil tank, an additional 1,000-gallon unknown UST was discovered and also removed (Tank 12).

All visibly contaminated soil was excavated and stockpiled on-site. In total, 40 yds³ of soil were excavated and stockpiled. A slight sheen was observed on the pit water, which was vacuumed out and did not reappear. Excavation was limited in all directions due to the presence of the existing building to the northwest, utility lines to the northeast, concrete paving to the southwest and Commercial Avenue to the southeast.

The tank removal activities are presented in a July 13, 1989 report titled Removal and Disposal of Four Underground Storage Tanks by Groundwater Technology, Inc. A copy of that report is included in Attachment H. Following removal, a subsequent investigation was conducted. The results of this supplemental investigation were presented in an October 17, 1990 UST Investigation Report by Melick-Tully Environmental, Inc. A copy of that report is included as Attachment I.

6.2 Soil Analyses

Post-excavation soil sampling from the sidewalls indicated that contaminated soil remained up against the garage building and along Commercial Avenue. Two monitoring wells were installed in the backfill to allow for subsequent sampling of groundwater. Slightly elevated concentrations of cadmium were identified in soil analyses. The site was assigned Case # 89-04-17-1356 by the NJDEP.

At the request of the NJDEP, a subsequent site investigation was performed, which included four test borings and the installation of two groundwater monitoring wells. The results of this assessment were summarized in a March 31, 1993 report titled Site/Remedial Investigation Report by Aaron Environmental Specialists. A copy of the report is included as Attachment J.

Subsequent site assessment activities did not indicate a concern for cadmium and the NJDEP issued a No Further Action (NFA) status for soils on March 11, 1999. A copy of that letter is included as Attachment K.

6.3 Groundwater Analyses

A slightly-elevated concentration of chlorobenzene was identified in the initial groundwater sampling. As a result, a second round of sampling was requested. The results are summarized in an April 29, 1992 report titled Evaluation of Subsurface Conditions, 2nd Round Sampling and Analysis by Aaron Environmental. The report is presented in Attachment L. Chlorobenzene is a parameter not associated with the USTs or Roadway's operations. Based upon a full assessment of groundwater quality in the vicinity of the tanks and on site, the State did not require clean-up and the UST closure was considered complete with no further action required.

7.0 PERMANANT CLOSURE OF USED OIL TANK

7.1 Used Oil Tank Removal

The used oil tank (Tank 10, between garage and guard shack) was closed in place in April, 1992. The original plan was to remove the UST, however, it was buried very deep (top of the tank was 8' below grade) and it was bolted to a large concrete pad. With the high water table, it became impossible to remove it, so Roadway received permission to permanently abandon the tank in place. After removal of any contents, the UST was cleaned from above. Upon exposing the tank, it was measured and found to be a 550-gallon tank, not a 1,000-gallon tank as was previously believed.

The tank closure project was summarized in an October 17, 1992 UST Closure Report by Aaron Environmental Specialists. A copy of this report is presented in Attachment M.

7.2 Soil Analyses

Soil analyses indicated elevated levels of chromium and antimony. The chromium was determined by the NJDEP to be related to either natural conditions or from the fill material used to fill in that part of Carlstadt and no further action was needed with respect to chromium. Antimony was slightly above non-residential standards. In addition, the detection limits used by the laboratory for cadmium were slightly above the residential direct contact standards of 1 mg/kg. While all cadmium results were identified as "not detected", the detection limit

was greater than the standard, so the NJDEP could not conclude that the levels were acceptable. Case # 92-04-21-1136 was assigned to the used oil tank closure. The State concluded that the concentrations were not an issue and suggested a deed restriction, indicating that the site should not be used for residential activities.

7.3 Groundwater Analyses

A groundwater assessment was conducted, which identified the presence of slightly-elevated concentrations cadmium, lead, mercury, arsenic and PCB-1248. Again, these parameters were believed to be related to the fill material used during development of the site and not related to the UST. Final UST closure was granted.

8.0 CURRENT ENVIRONMENTAL STATUS

8.1 Additional Site Assessments and Groundwater Monitoring

Currently, two areas of the site remain open with respect to environmental issues, the used oil tank area [Area of Concern 2/AOC-2 (Case # 92-04-21-1136)] and the former UST area in front of the garage [Area of Concern 1/AOC-1 (Case #89-04-17-1356)]. In both areas, minor concentrations of metals in the soil and groundwater remain. In response to a NJDEP January 22, 1996 letter, Roadway conducted a soil boring and sampling program and a soil microbial evaluation at the site in September, 1996 in order to further delineate the extent of soil and groundwater contamination in both areas. The results of the investigation were presented in a January, 1997 report titled Remedial Action Workplan by Geraghty & Miller, Inc. A copy of that report is included as Attachment N.

8.2 Groundwater Sampling

Groundwater sampling protocols were carefully followed to limit the turbidity of the water samples. It was believed that previous hits for metals were due to turbid samples. Unlike most States, New Jersey protocols for analysis do not allow filtering of the samples prior to analysis. Therefore, the naturally-occurring metals in sediment appear to be in the water. Duplicate samples, which were filtered, were also analyzed in order to provide additional confirmation.

All VOC, base neutral and PCBs were below NJDEP Groundwater Quality Standards. For the non-turbid and unfiltered samples, arsenic was slightly above the NJDEP Groundwater Quality Standards in one well and appears to be unrelated to the USTs, based upon where it was identified. Previous sample

results appear to have identified several metals due to the turbidity in the samples, not because of any contamination issue.

8.3 Soil Sampling

The concentrations of antimony in AOC-2 exceed the NJDEP Residential Soil Cleanup Criteria, but are an order of magnitude below the NJDEP Non-Residential Soil Cleanup Criteria. No other parameters present a concern.

8.4 Remedial Action Summary

No further action is proposed for the site and clean-up is considered complete. Roadway is pursuing the implementation of the appropriate institutional control, which is in the form of a Declaration of Environmental Restriction (DER) for the purposes of applying Non-Residential Soil Cleanup Criteria at the Site.

9.0 WASTE MANAGEMENT PRACTICES

9.1 General Practices

Roadway has always and continues to conduct its operations in an environmentally-responsible manner. This includes everything from vehicle fueling and maintenance to handling of customers' freight and responding promptly and responsibly when an incident occurs. All vehicle maintenance activities and product storage (motor oil, antifreeze, lube oil, etc.) are currently and have always been managed by Roadway inside the garage in order to prevent storm water from contacting exposed products, parts and potential spills. Roadway is not aware of any spills that have occurred in the yard at this location during our ownership (with one exception, Attachment T). Included in Attachment R are Roadway's waste management manuals that describe the protocols and procedures employed by Roadway to manage waste materials. These are updated from time to time, as necessary.

9.2 Storm Water Permit

Roadway has been issued and has maintained a storm water permit for the subject site since July 1, 1995. A copy of the current storm water permit is included as Attachment D. In accordance with permit conditions, best management practices are used to prevent contaminated runoff from entering into the storm drainage. A Storm Water Pollution Prevention Plan (SWP3) has been prepared and used at the site since January, 1996. A copy of this document is included as Attachment U. Inspections of the property looking for potential sources of contamination are

performed regularly and documented annually and the SWP3 plan has been updated periodically, as the situation dictates. Storm water sampling and testing are performed semi-annually. No contaminated storm water runoff issues have ever been identified. In addition, the NJDEP has inspected the site on several occasions. Based upon their inspections, Roadway has always been in compliance with storm water regulations. Copies of storm water test results are included as Attachment V.

9.3 Specific Site Procedures

All drums and containers containing product and waste materials are stored inside the garage. Floor drains pass through an oil/water separator and discharge into the sanitary sewer. There are no storm sewer connections from any of the garage floor drains. Waste oil, antifreeze and parts solvents are periodically picked up and disposed off-site, as previously described and in accordance with Roadway's waste management manuals included in Attachment R.

10.0 DIESEL TANK MAINTENANCE AND COMPLIANCE

10.1 UST Registration and Testing

As identified above, a new 10,000-gallon, double walled, Buffhide underground diesel fuel tank was installed at the site in 1986. This tank meets all UST regulatory requirements for leak detection, overfill prevention and spill containment. It was originally registered, per regulatory requirements, in August 1986, immediately following its' installation and shortly after the property was bought by Roadway. Since that time, the tank has been tightness tested in 1986, 1993, 1994, 1995, 1996, 1997, 2000 and 2003. The tank and associated piping has passed the tightness test each time. Tank tightness test results are presented in Attachment G.

10.2 UST Maintenance

The tank and its associated leak detection system and pollution prevention devices are inspected periodically and certified to the State on an annual basis. The UST has been in compliance with both federal and state regulatory requirements since its installation. No leaks, spills or overfills have occurred relative to the tank. As a result, the tank has had no impact to the environment.

11.0 SUMMARY

Roadway's activities have not resulted in any discharge, directly or indirectly, to Berry's Creek or the Berry's Creek drainage area. While there were some minor environmental concerns with underground storage tanks associated with the property when Roadway purchased the site in 1986, considerable effort was spent to eliminate the potential concerns in order to minimize or eliminate the potential for environmental issues, either through direct or indirect discharge to the surrounding area. None of the environmental concerns extended beyond the site property boundary nor impacted the study area.

As Roadway has had no environmental impact to the Berry's Creek Study Area, Roadway should have no involvement in previous, current or future assessment or remedial activities associated with the Berry's Creek Study Area.

FIGURES

- 1 General Location Map
- 2 Site Plan
- 3. Tank Locations

FIGURE 1

General Location Map

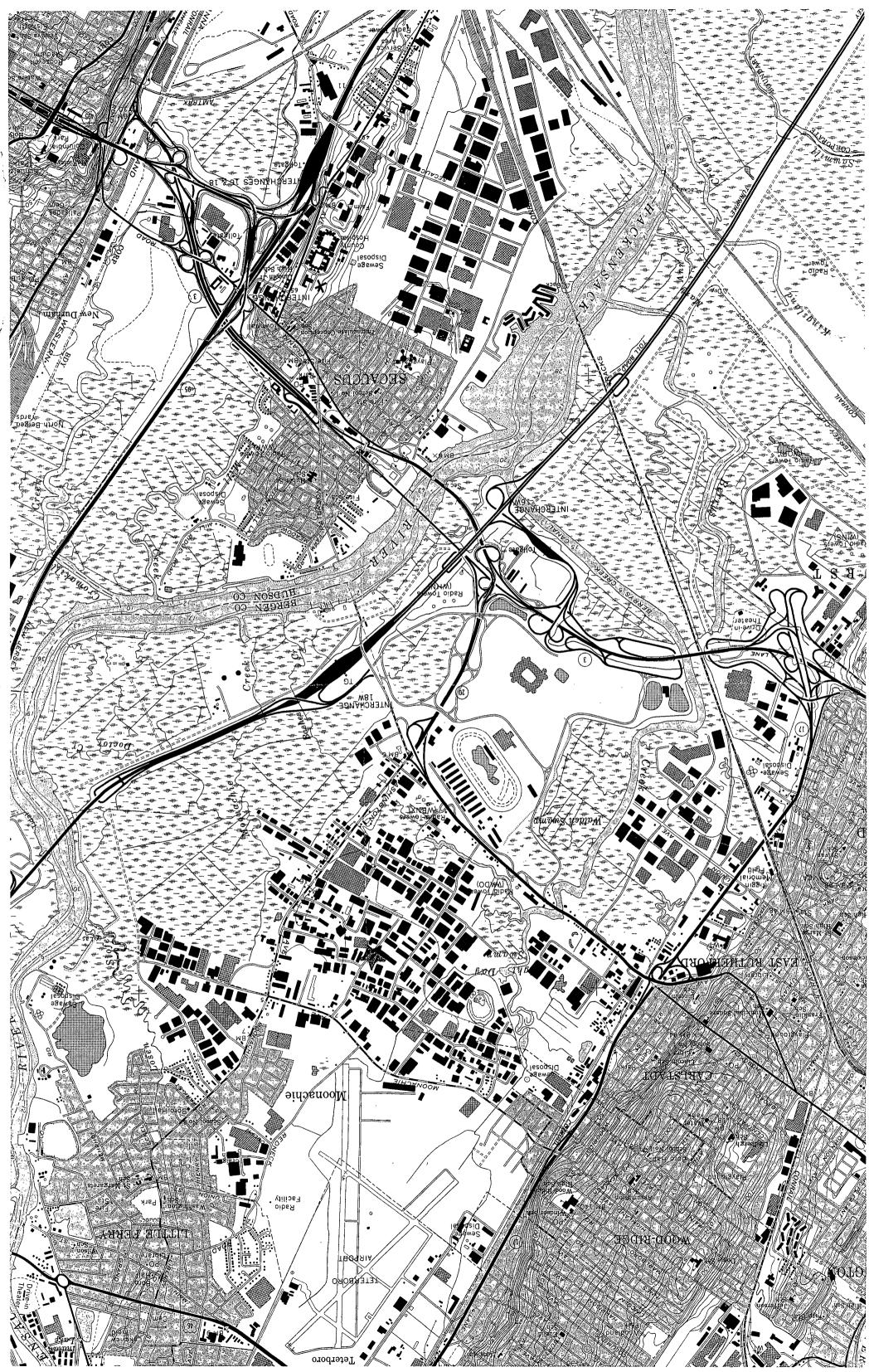
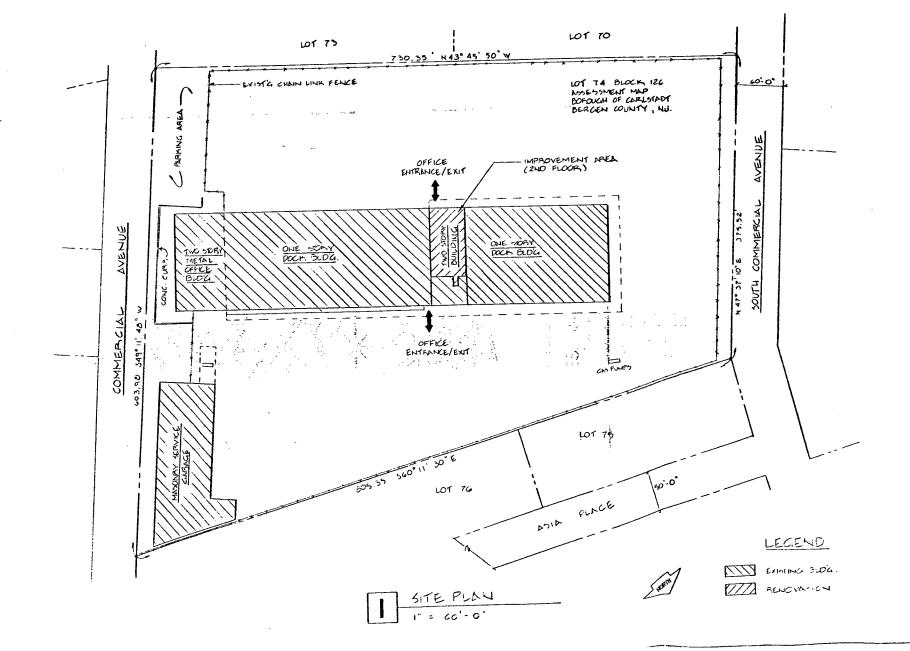


FIGURE 2

Site Plan

OFFICE AREA IMPROVEMENTS
ROADWAY EXPRESS, INC.
650 COMMERCIAL AVENUE
CARLSTADT, NEW JERSEY



- A 1000 1100 1100 1
- WINDOW DETAILS AND SCHEDULE
- 5 REFLECTIVE CEILING DIAN
- G. HVAC PLAN
- 7. ELECTRICAL PLAN
- 8. SPECIFICATIONS

IMPROVEMENT AREA DESCRIPTION

EXISTING CONSTRUCTION

FLOORS - WOOD DECKING OVER 2 x G WOOD JOISTS OVER 4" CONCRETE OVER STEEL I BEAMS.

BOOF - BUILT-UP FROM OVER METAL DECK OVER THEEL I BEAMS.

CEILING - ACOUSTICAL TILE.

EXTERIOR WALLS - MASONRY

INTERIOR WALLS - MAYONRY / 1800 TUD

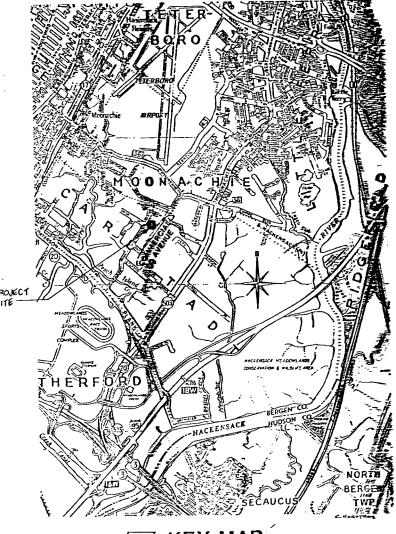
EXHYTING USE-BUSHESS OFFICE - USE GROUP B

PROPOSED USE - UNCHANCED

BUILDING HERHT - 32'-0"= (2 STORY)

IMPROVEMENT APEN - 2040 ± 50.FT.

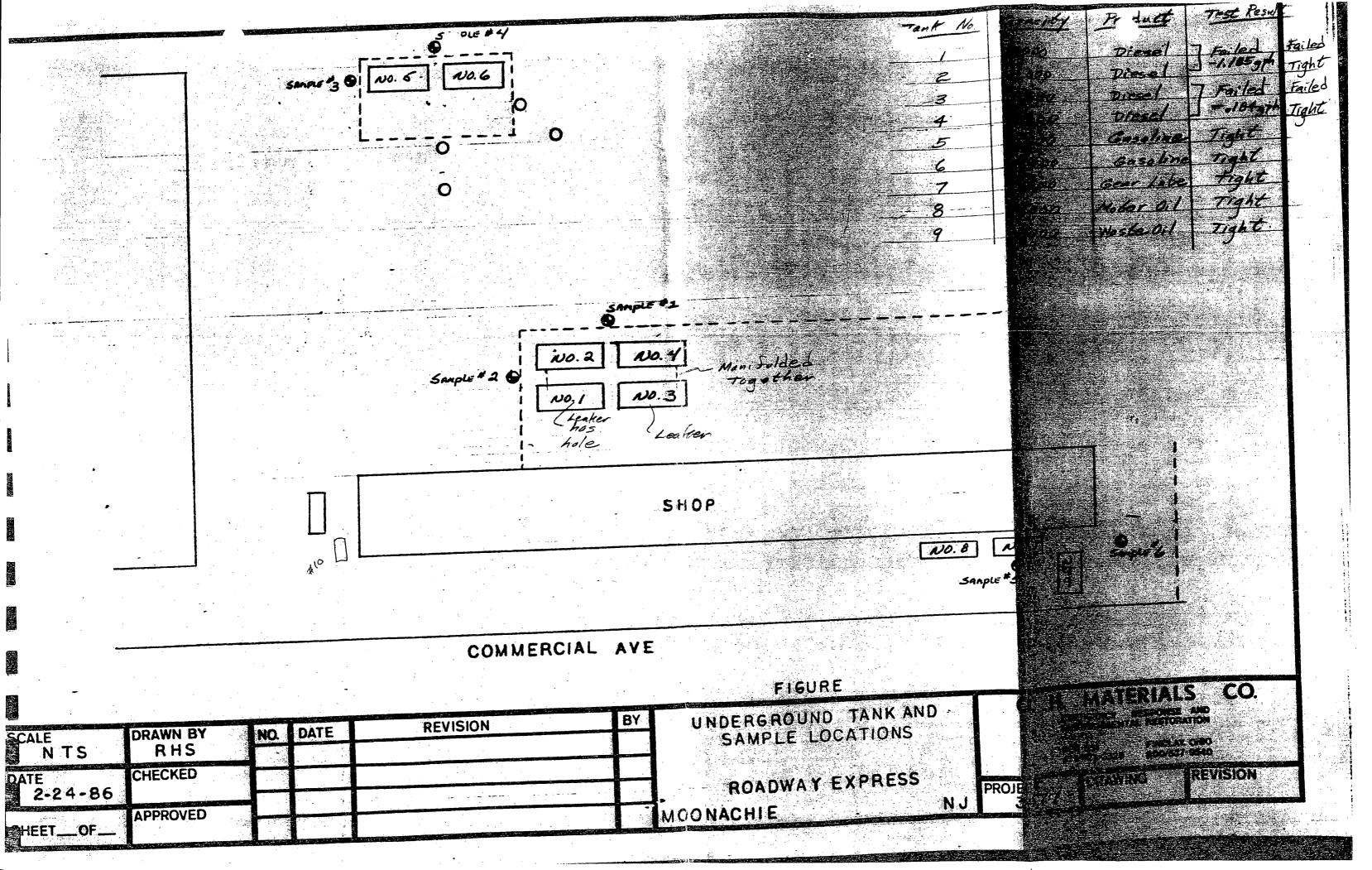
OCCUPIED LOAD - 12 (EMPTING WID PROPOSED)



2 KEY MAP

FIGURE 3

Tank Locations



ATTACHMENTS

Α .	Legal Description
В	Property Deed
C	Property Leases
D	Storm Water Permit
E	Summary of Findings Report-Project #3477 dated April 18, 1986 by O. H.
	Materials Corp.
F	Site Remediation Report dated April, 1987 by ERM-Tanknomics, Inc.
G	Current Underground Storage Tank Specifications
Н	Removal and Disposal of Four Underground Storage Tanks dated July 13, 1989
	by Groundwater Technology, Inc.
I	UST Investigation Report dated October 17, 1990 by Melick-Tully
	Environmental, Inc.
J	Site/Remedial Investigation Report dated March 31, 1993 by Aaron
	Environmental Specialists
K	New Jersey Department of Environmental Protection letter dated March 11, 1999
L	Evaluation of Subsurface Conditions, 2 nd Round Sampling and Analysis dated
•	April 29, 1992 by Aaron Environmental Specialists
M	UST Closure Report dated October 17, 1992 by Aaron Environmental Specialists
N	Remedial Action Workplan dated January, 1997 by Geraghty & Miller, Inc.
O	Historical Aerial Photographs and Topographic Maps
P	Waste Manifests and Summary Table
Q	List of Transporters and Disposal Facilities
R	Roadway Waste Management Manuals
$\cdot S$	Ryder Truck Rental Garage Audit
T	Spill Report
U	Storm Water Pollution Prevention Plan (SWP3)
V	Storm Water Test Results

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